

ORIGINAL  
OPEN MEETING



0000031538

410

MEMORANDUM

RECEIVED

2005 SEP 30 P 4:17

TO: THE COMMISSION

FROM: Utilities Division

AZ CORP COMMISSION  
DOCUMENT CONTROL

DATE: September 30, 2005

RE: IN THE MATTER OF THE APPLICATION FOR SOUTHWEST GAS CORPORATION AND BLACK MOUNTAIN GAS COMPANY FOR APPROVAL OF ACQUISITION PLAN AND IF APPROPRIATE, WAIVER OF SELECTED PROVISIONS OF THE AFFILIATE RULES – PROPOSED PROGRAMS FOR PAGE DIVISION (DOCKET NOS. G-01551A-02-0425 AND G-01970A-02-0425)

Background

On February 28, 2005, Southwest Gas Corporation (“Southwest” or “Company”) submitted a filing to the Commission to comply with requirements of Decision No. 66101 (July 25, 2003). Decision No. 66101 authorized the acquisition of Black Mountain Gas by Southwest. The Decision also established certain requirements of Southwest should it acquire Black Mountain Gas and not sell its Page Division within 18 months. Southwest has acquired Black Mountain Gas but has not sold the Page Division. On June 7, 2005, Southwest submitted a new filing to replace the February 28, 2005, filing.

This application consists of Arizona Propane Tariff No. 1 which would replace in entirety the currently effective Page Division tariff of Black Mountain Gas Company. Southwest’s Arizona Propane Tariff No. 1 maintains existing rates and adds new services required by Decision No. 66101. Decision No. 66101 orders that Southwest,

“make a filing for Commission approval to begin offering the Page Division propane customers service options that are currently available to Southwest Gas Corporation’s customers. Such services include, but are not limited to, a low income discount tariff for residential customers, a balanced payment plan option, an online bill payment option, and applicable demand-side management programs.”

Pursuant to this requirement, Southwest proposes the following new items in the tariff: Low Income Rate Assistance Discount Pilot Program (“LIRA” or “Pilot”), Summary Billing, Equal Payment Plan (“EPP”), Landlord Agreements, Deferred Payment Plan, and Electronic Billing. A demand-side management (“DSM”) program is not proposed in the filing.

LIRA Program

The LIRA Pilot program that Southwest proposes for the Page Division offers to eligible residential propane customers a discount of \$12.10 during the winter season, November 1 through April 30. For bills less than \$12.10, the LIRA discount will equal the amount of the bill for that month, exclusive of any other non-related credits. LIRA eligibility requirements for Southwest's natural gas customers are set forth in Southwest's Arizona Gas Tariff No. 7, Schedule No. G-10. The tariff describes that to be eligible for the LIRA program a customer's household income must not exceed 150 percent of the Federal poverty level. Staff recommends that this same criteria be used for the Page LIRA program.

In Southwest's natural gas territory, the LIRA program benefit is calculated at 20 percent of a residential customer's commodity rate during winter months. Use of this method to determine the LIRA benefit makes the total cost of the LIRA program primarily dependent on two variables, the number of customers that participate in the program and the therm use of the participants.

Southwest has proposed that the LIRA benefit available to each Page Division customer in the Pilot program be limited to \$12.10 per customer monthly. This is the average benefit received by LIRA participants in Southwest's natural gas service territory. Use of a LIRA benefit that is capped at \$12.10 per customer in the Page Division will help in controlling for the uncertainty related to program costs that are a function of customer therm use.

Southwest also proposes that the annual cost of the program be capped at \$12,500. This cap level is the approximate cost Southwest estimates would be necessary to provide the LIRA benefit to 15 percent of residential customers served under Schedule No. PR-1. Southwest has indicated that it anticipates a 15 percent LIRA participation rate based on experience in other Arizona communities with similar demographics. While this may be the participation rate of cities of similar demographics, one cannot be certain of the actual participation rate in the Page Division prior to implementation of either a LIRA pilot or program. Use of a \$12,500 cap will help to control for the uncertainty related to program costs that are a function of the number of customers that participate in the program.

Given uncertainty regarding future participation levels in the LIRA program and consequently the costs associated with provision of the LIRA benefit, Southwest proposes that LIRA be implemented initially as a pilot program. Once participation in the LIRA Pilot Program is known, a more informed decision can be made regarding whether a LIRA benefit that is calculated as a percentage of commodity cost should be implemented in the Page Division. The Pilot will also provide data to help in determining an appropriate benefit level should a percentage based benefit be adopted in the future.

Southwest has stated in its filing that it intends to record costs of the LIRA Pilot in a deferral account and will seek recovery of the deferred amounts in the next Page Division, Arizona general rate case. Southwest has indicated in response to a data request from Staff that

it intends to seek recovery of interest costs for the deferred amounts at 7.86 percent. Southwest states that this rate is equal to the Page, Arizona property's authorized rate of return and is commensurate with the interest applied to the LIRA account for Southwest's Arizona natural gas properties. Staff finds it appropriate for Southwest to seek consideration of recovery of deferred costs in its next Page Division general rate case.

A deferral mechanism provides a regulated utility the ability to defer costs that would otherwise be expensed using generally accepted accounting principles. It permits alternative accounting treatment of capital or other costs as permitted under the Uniform System of Accounts. However, because the deferral has been determined outside of a general rate proceeding, the Company will only be allowed to include carrying costs utilizing the Federal Energy Regulatory Commission ("FERC") interest rate pursuant to Section 154.501 of the FERC regulations.<sup>1</sup>

Southwest's application does not propose an ending date or limited period of time for the LIRA Pilot program. In order to test customer participation in a LIRA program in the Page Division, Staff recommends that the LIRA Pilot program be implemented for two years. At the end of 20 months of implementation of the LIRA Pilot program, Southwest should file with the Commission an application making a recommendation as to whether the LIRA program should be continued, modified, or eliminated after the two years. This would allow the Pilot program to function for two complete winters and would allow for consideration of the recommendation before termination of the Pilot program. The Pilot program should terminate if a rate case decision were to implement a LIRA program on a regular basis, rather than a pilot basis, prior to two years of implementation of the Pilot program.

In order that customers might be made aware of the LIRA Pilot program and its benefits, Staff recommends that, within 30 days of a decision in this matter, Southwest should begin to market LIRA in accordance with a plan submitted to the Director of the Utilities Division for review prior to implementation.

#### DSM Program

Decision No. 66101 orders Southwest to make a filing for Commission approval to begin offering "applicable demand-side management programs." Southwest has not included a proposal for a DSM program in this application. In order to comply with Decision No. 66101, Staff recommends that Southwest develop information regarding a possible DSM program or programs. Such a study should include program descriptions, program costs and benefits, cost effectiveness, eligibility, anticipated participation levels, marketing plans, and specific information regarding the services provided consistent with applicable DSM policies and recommendations. Staff recommends that Southwest file a report containing such information

---

<sup>1</sup> The FERC, on a quarterly basis, publishes authorized interest rates for natural gas pipelines. The rates are available at <http://www.ferc.gov/legal/acct-matts/interest-rates.asp>.

with the Commission within six months of a decision in this matter along with a request for approval of any cost-effective DSM program or programs.

Service Options

The new service options (Summary Billing, EPP, Landlord Agreements, Deferred Payment Plan, and Electronic Billing) are described in the proposed Arizona Propane Tariff No. 1. All of these new options are similar to options currently offered and approved in Southwest Gas Arizona Gas Tariff No. 7, Southwest's tariff for natural gas customers in Arizona. Summary Billing provides the opportunity for customers who have multiple accounts to receive a bill with summary data from each of the accounts. The Equal Payment Program provides a pricing option for customers. It allows customers to pay their estimated annual bill in 12 equal payments. Landlord Agreements allows landlords to continue service in their own names when renters leave. The Deferred Payment Plan offers payment plans to qualified customers to retire unpaid bills. Electronic Billing allows customers the option of receiving and paying bills electronically.

Fair Value Implications

Staff analyzed this application in terms of whether there were fair value implications. The impact on revenue is estimated to be a reduction of \$12,500, the annual LIRA program cap. Although fair value rate base is not impacted directly, the impact from these programs on rate of return on Page Division's rate base could be approximately a 0.65 percent reduction. When Southwest's entire Arizona operations are considered, the impact of the approximate 0.65 percent reduction for the Page Division, a small part of Southwest's total Arizona operation, is de minimus.

Recommendations

Staff recommends approval of Arizona Propane Tariff No. 1 with the following modifications:

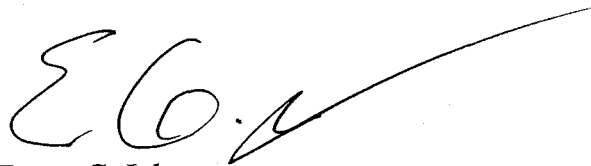
- (a) References to A.C.C. Sheet No. 3 on A.C.C. Sheet Nos. 9 and 24 should be changed to Sheet No. 5 to accurately reflect the source of rates and charges;
- (b) Eligibility requirements for LIRA should be listed on the tariff;
- (c) Eligibility requirements for the LIRA program in the Page Division should be the same criteria as approved in Southwest's Arizona Gas Tariff No. 7, Schedule No. G-10.

Staff also recommends the following:

- (d) LIRA should be implemented as a two-year pilot program;
- (e) At the end of 20 months of implementation of the LIRA Pilot program, Southwest should docket, as a compliance item in this case, an application making a recommendation as to whether the LIRA program should be continued, modified, or eliminated after two years;

- (f) A deferral account should be established for the costs of the LIRA program with carrying cost calculated pursuant to FERC Section 154.501 of the FERC regulations.
- (g) Southwest should file annual reports with Docket Control, as a compliance item in this case, by May 30th of each year of the Pilot program. The reports should document the previous winter season's (November 1 through April 30) activity by month, including the number of participants, the total amount of discounts, the median and mean amount of discount per customer, the amount of administrative expenses, and the balance in the deferral account;
- (h) Within 30 days of a decision in this matter, Southwest should begin to market LIRA in accordance with a plan submitted to the Director of the Utilities Division for review prior to implementation;
- (i) Within six months of a decision in this matter, Southwest should conduct a study on DSM as described above and docket, as a compliance item in this case, a report along with a request for approval of any cost-effective DSM programs.

Staff further recommends that Southwest file with Docket Control, as a compliance item in this case, a corrected version of Arizona Propane Tariff No. 1 consistent with this decision within 30 days of a decision in this matter.

A handwritten signature in black ink, appearing to read 'EGJ', followed by a long, sweeping horizontal line that extends to the right.

Ernest G. Johnson  
Director  
Utilities Division

EGJ:SPI:rdp/JDG

ORIGINATOR: Steve Irvine

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**BEFORE THE ARIZONA CORPORATION COMMISSION**

JEFF HATCH-MILLER  
Chairman  
WILLIAM A. MUNDELL  
Commissioner  
MARC SPITZER  
Commissioner  
MIKE GLEASON  
Commissioner  
KRISTIN K. MAYES  
Commissioner

IN THE MATTER OF THE APPLICATION FOR SOUTHWEST GAS CORPORATION AND BLACK MOUNTAIN GAS COMPANY APPROVAL OF ACQUISITION PLAN AND IF APPROPRIATE, WAIVER OF SELECTED PROVISIONS OF THE AFFILIATE RULES – PROPOSED PROGRAMS FOR PAGE DIVISION	) DOCKET NOS. G-01551A-02-0425 G-01970A-02-0425  DECISION NO. _____ <u>ORDER</u>
--	--

Open Meeting  
October 18 and 19, 2005  
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. Southwest Gas Corporation (“Southwest” or “Company”) is certificated to provide natural gas and propane services as a public service corporation in the State of Arizona.
2. On February 28, 2005, Southwest submitted a filing to the Commission to comply with requirements of Decision No. 66101 (July 25, 2003). Decision No. 66101 authorized the acquisition of Black Mountain Gas by Southwest. The Decision also established certain requirements of Southwest should it acquire Black Mountain Gas and not sell its Page Division within 18 months. Southwest has acquired Black Mountain Gas but has not sold the Page Division. On June 7, 2005, Southwest submitted a new filing to replace the February 28, 2005, filing.
3. This application consists of Arizona Propane Tariff No. 1 which would replace in entirety the currently effective Page Division tariff of Black Mountain Gas Company. Southwest’s

1 Arizona Propane Tariff No. 1 maintains existing rates and adds new services required by Decision  
2 No. 66101. Decision No. 66101 orders that Southwest, “make a filing for Commission approval to  
3 begin offering the Page Division propane customers service options that are currently available to  
4 Southwest Gas Corporation’s customers. Such services include, but are not limited to, a low  
5 income discount tariff for residential customers, a balanced payment plan option, an online bill  
6 payment option, and applicable demand-side management programs.”

7 4. Pursuant to this requirement, Southwest proposes the following new items in the  
8 tariff: Low Income Rate Assistance Discount Pilot Program (“LIRA” or “Pilot”), Summary  
9 Billing, Equal Payment Plan (“EPP”), Landlord Agreements, Deferred Payment Plan, and  
10 Electronic Billing. A demand-side management (“DSM”) program is not proposed in the filing.

11 5. The LIRA Pilot program that Southwest proposes for the Page Division offers to  
12 eligible residential propane customers a discount of \$12.10 during the winter season, November 1  
13 through April 30. For bills less than \$12.10, the LIRA discount will equal the amount of the bill  
14 for that month, exclusive of any other non-related credits. LIRA eligibility requirements for  
15 Southwest’s natural gas customers are set forth in Southwest’s Arizona Gas Tariff No. 7, Schedule  
16 No. G-10. The tariff describes that to be eligible for the LIRA program a customer’s household  
17 income must not exceed 150 percent of the Federal poverty level. Staff has recommended that this  
18 same criteria be used for the Page LIRA program.

19 6. In Southwest’s natural gas territory, the LIRA program benefit is calculated at 20  
20 percent of a residential customer’s commodity rate during winter months. Use of this method to  
21 determine the LIRA benefit makes the total cost of the LIRA program primarily dependent on two  
22 variables, the number of customers that participate in the program and the therm use of the  
23 participants.

24 7. Southwest has proposed that the LIRA benefit available to each Page Division  
25 customer in the Pilot program be limited to \$12.10 per customer monthly. This is the average  
26 benefit received by LIRA participants in Southwest’s natural gas service territory. Use of a LIRA  
27 benefit that is capped at \$12.10 per customer in the Page Division will help in controlling for the  
28 uncertainty related to program costs that are a function of customer therm use.

1           8.       Southwest also proposes that the annual cost of the program be capped at \$12,500.  
2 This cap level is the approximate cost Southwest estimates would be necessary to provide the  
3 LIRA benefit to 15 percent of residential customers served under Schedule No. PR-1. Southwest  
4 has indicated that it anticipates a 15 percent LIRA participation rate based on experience in other  
5 Arizona communities with similar demographics. While this may be the participation rate of cities  
6 of similar demographics, one cannot be certain of the actual participation rate in the Page Division  
7 prior to implementation of either a LIRA pilot or program. Use of a \$12,500 cap will help to  
8 control for the uncertainty related to program costs that are a function of the number of customers  
9 that participate in the program.

10           9.       Given uncertainty regarding future participation levels in the LIRA program and  
11 consequently the costs associated with provision of the LIRA benefit, Southwest proposes that  
12 LIRA be implemented initially as a pilot program. Once participation in the LIRA Pilot Program  
13 is known, a more informed decision can be made regarding whether a LIRA benefit that is  
14 calculated as a percentage of commodity cost should be implemented in the Page Division. The  
15 Pilot will also provide data to help in determining an appropriate benefit level should a percentage  
16 based benefit be adopted in the future.

17           10.       Southwest has stated in its filing that it intends to recover costs of the LIRA Pilot in  
18 a deferral account and will seek recovery of the deferred amounts in the next Page Division,  
19 Arizona general rate case. Southwest has indicated in response to a data request from Staff that it  
20 intends to seek recovery of interest costs for the deferred amounts at 7.86 percent. Southwest  
21 states that this rate is equal to the Page, Arizona Property's authorized rate of return and is  
22 commensurate with the interest applied to the LIRA account for Southwest's Arizona natural gas  
23 properties. Staff finds it appropriate for Southwest to seek consideration of recovery of deferred  
24 costs in its next Page Division general rate case.

25           A deferral mechanism provides a regulated utility the Ability to defer costs that would  
26 otherwise be expensed using generally accepted accounting principles. It permits alternative  
27 accounting treatment of capital or other costs as permitted under the Uniform System of Accounts.  
28 However, because the deferral has been determined outside of a general rate proceeding, the



1 Company will only be allowed to include carrying costs utilizing the Federal Energy Regulatory  
2 Commission ("FERC") interest rate pursuant to Section 154.501 of the FERC regulations.<sup>1</sup>

3 11. Southwest's application does not propose an ending date or limited period of time  
4 for the LIRA Pilot program. In order to test customer participation in a LIRA program in the Page  
5 Division, Staff recommends that the LIRA Pilot program be implemented for two years. At the  
6 end of 20 months of implementation of the LIRA Pilot program, Southwest should file with the  
7 Commission an application making a recommendation as to whether the LIRA program should be  
8 continued, modified, or eliminated after the two years. This would allow the Pilot program to  
9 function for two complete winters and would allow for consideration of the recommendation  
10 before termination of the Pilot program. The Pilot program should terminate if a rate case decision  
11 were to implement a LIRA program on a regular basis, rather than a pilot basis, prior to two years  
12 of implementation of the Pilot program.

13 12. In order that customers might be made aware of the LIRA Pilot program and its  
14 benefits, Staff has recommended that, within 30 days of a decision in this matter, Southwest should  
15 begin to market LIRA in accordance with a plan submitted to the Director of the Utilities Division  
16 for review prior to implementation.

17 13. Decision No. 66101 orders Southwest to make a filing for Commission approval to  
18 begin offering "applicable demand-side management programs." Southwest has not included a  
19 proposal for a DSM program in this application. In order to comply with Decision No. 66101,  
20 Staff has recommended that Southwest develop information regarding a possible DSM program or  
21 programs. Such a study should include program descriptions, program costs and benefits, cost  
22 effectiveness, eligibility, anticipated participation levels, marketing plans, and specific information  
23 regarding the services provided consistent with applicable DSM policies and recommendations.  
24 Staff has recommended that Southwest file a report containing such information with the  
25

26 \_\_\_\_\_  
27 <sup>1</sup> The FERC, on a quarterly basis, published authorized interest rates for natural gas pipelines. The rates are available  
28 at <http://www.ferc.gov/legal/acct-matts/interest-rates.asp>.

Commission within six months of a decision in this matter along with a request for approval of any cost-effective DSM program or programs.

14. The new service options (Summary Billing, EPP, Landlord Agreements, Deferred Payment Plan, and Electronic Billing) are described in the proposed Arizona Propane Tariff No. 1. All of these new options are similar to options currently offered and approved in Southwest Gas Arizona Gas Tariff No. 7, Southwest's tariff for natural gas customers in Arizona. Summary Billing provides the opportunity for customers who have multiple accounts to receive a bill with summary data from each of the accounts. The Equal Payment Program provides a pricing option for customers. It allows customers to pay their estimated annual bill in 12 equal payments. Landlord Agreements allows landlords to continue service in their own names when renters leave. The Deferred Payment Plan offers payment plans to qualified customers to retire unpaid bills. Electronic Billing allows customers the option of receiving and paying bills electronically.

15. Staff has analyzed this application in terms of whether there were fair value implications. The impact on revenue is estimated to be a reduction of \$12,500, the annual LIRA program cap. Although fair value rate base is not impacted directly, the impact for these programs on rate of return on Page Division's rate base could be approximately a 0.65 percent reduction. When Southwest's entire Arizona operations are considered, the impact of the approximate 0.65 percent reduction for the Page Division, a small part of Southwest's total Arizona operation, is de minimus.

16. Staff has recommended approval of Arizona Propane Tariff No. 1 with the following modifications:

(a) References to A.C.C. Sheet No. 3 on A.C.C. Sheet Nos. 9 and 24 should be changed to Sheet No. 5 to accurately reflect the source of rates and charges; (b) Eligibility requirements for LIRA should be listed on the tariff; (c) Eligibility requirements for the LIRA program in the Page Division should be the same criteria as approved in Southwest's Arizona Gas Tariff No. 7, Schedule No. G-10.

17. Staff has also recommended the following:

...

(d) LIRA should be implemented as a two-year pilot program; (e) At the end of 20 months of implementation of the LIRA Pilot program, Southwest should docket, as a compliance matter in this case, an application making a recommendation as to whether the LIRA program should be continued, modified, or eliminated after two years; (f) A deferral account should be established for the costs of the LIRA program with carrying costs calculated pursuant to FERC Section 154.501 of the FERC regulations; (g) Southwest should file annual reports with Docket Control, as a compliance matter in this case, by May 30th of each year of the Pilot program. The reports should document the previous winter season's (November 1 through April 30) activity by month, including the number of participants, the total amount of discounts, the median and mean amount of discount per customer, the amount of administrative expenses, and the balance in the deferral account; (h) Within 30 days of a decision in this matter, Southwest should begin to market LIRA in accordance with a plan submitted to the Director of the Utilities Division for review prior to implementation; (i) Within six months of a decision in this matter, Southwest should conduct a study on DSM as described above and docket, as a compliance matter in this case, a report along with a request for approval of any cost-effective DSM programs.

18. Staff has further recommended that Southwest file with Docket Control, as a compliance matter in this case, a corrected version of Arizona Propane Tariff No. 1 consistent with this decision within 30 days of a decision in this matter.

#### CONCLUSIONS OF LAW

1. Southwest Gas Corporation is an Arizona public service corporation within the meaning of Article XV, Section 2, of the Arizona Constitution.

2. The Commission has jurisdiction over Southwest Gas Corporation and over the subject matter of the application.

3. Approval of the proposed modifications to the tariff does not constitute a rate increase as contemplated by A.R.S. Section 40-250.

4. The Commission, having reviewed the application and Staff's Memorandum dated September 30, 2005, concludes that it is in the public interest to approve the tariff modifications.

...

ORDER

IT IS THEREFORE ORDERED that Arizona Propane Tariff No. 1 is approved as discussed herein.

IT IS FURTHER ORDERED that references to A.C.C. Sheet No. 3 on A.C.C. Sheet Nos. 9 and 24 be changed to Sheet No. 5 to accurately reflect the source of rates and charges.

IT IS FURTHER ORDERED that eligibility requirements for the LIRA program in the Page Division be the same criteria as approved in Southwest's Arizona Gas Tariff No. 7, Schedule No. G-10, and be listed on the tariff.

IT IS FURTHER ORDERED that LIRA be implemented as a two-year pilot program.

IT IS FURTHER ORDERED that at the end of 20 months of implementation of the LIRA Pilot program, Southwest shall docket, as a compliance matter in this case, an application making a recommendation as to whether the LIRA program should be continued, modified, or eliminated after two years.

IT IS FURTHER ORDERED that a deferral account be established for the costs of the LIRA program with carrying charges calculated pursuant to FERC Section 154.501 of the FERC regulations.

IT IS FURTHER ORDERED that Southwest file annual reports with Docket Control, as a compliance matter in this case, by May 30<sup>th</sup> of each year of the Pilot program. These reports shall document the previous winter season's (November 1 through April 30) activity by month, including the number of participants, the total amount of discounts, the median and mean amount of discount per customer, the amount of administrative expenses, and the balance in the deferral account.

IT IS FURTHER ORDERED that within 30 days of a decision in this matter, Southwest shall begin to market LIRA in accordance with a plan submitted to the Director of the Utilities Division for review prior to implementation.

IT IS FURTHER ORDERED that within six months of a decision in this matter, Southwest shall conduct a study on DSM as described above and docket, as a compliance matter in this case, a report along with a request for approval of any cost-effective DSM programs.

1 IT IS FURTHER ORDERED that Southwest file with Docket Control, as a compliance  
2 matter in this case, a corrected version of Arizona Propane Tariff No. 1 consistent with this  
3 decision within 30 days of a decision in this matter.

4 IT IS FURTHER ORDERED that this Order shall be effective immediately.

5  
6 **BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**

7  
8  
9 CHAIRMAN

COMMISSIONER

10  
11  
12 COMMISSIONER

COMMISSIONER

COMMISSIONER

13 IN WITNESS WHEREOF, I BRIAN C. McNEIL, Executive  
14 Director of the Arizona Corporation Commission, have  
15 hereunto, set my hand and caused the official seal of this  
16 Commission to be affixed at the Capitol, in the City of  
17 Phoenix, this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

18  
19 BRIAN C. McNEIL  
20 Executive Director

21 DISSENT: \_\_\_\_\_

22  
23 DISSENT: \_\_\_\_\_

24 EGJ:SPI:rdp/JDG  
25  
26  
27  
28

Decision No. \_\_\_\_\_

1 SERVICE LIST FOR: SOUTHWEST GAS CORPORATION AND BLACK MOUNTAIN GAS  
COMPANY

2 DOCKET NOS. G-01551A-02-0425 AND G-01970A-02-0425

3  
4 Mr. Roger C. Montgomery  
Vice President/Pricing  
5 Southwest Gas Corporation  
5241 Spring Mountain Road  
6 Post Office Box 98510  
7 Las Vegas, Nevada 89193-8510

8 Mr. Ernest G. Johnson  
Director, Utilities Division  
9 Arizona Corporation Commission  
1200 West Washington  
10 Phoenix, Arizona 85007

11 Mr. Christopher C. Kempley  
12 Chief Counsel  
Arizona Corporation Commission  
13 1200 West Washington  
14 Phoenix, Arizona 85007